

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

JEREMY LEE HILTON and	)	
RENAE MARIE HILTON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO.: <b>2:07-cv-0741-MHT</b>
	)	
UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	

**JOINT AGREEMENT TO TRANSFER**

COME NOW Plaintiffs, by and through George J. Hanko III, Esquire, and Defendant, the United States, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and pursuant to 28 U.S.C. § 1404 (a), jointly agree that this case should be transferred to the District of Maryland. In support hereof, the parties state as follows:

1. On November 5, 2007, the United States moved to transfer this case to the District of Maryland pursuant to 28 U.S.C. § 1404 (a). The Court set the motion to transfer for submission on November 13, 2007.
2. Counsel for plaintiffs and the United States have conferred, and plaintiffs have agreed that they do not oppose the United States' motion to transfer.
3. Plaintiffs would prefer that this case be docketed in the Greenbelt Division of the District of Maryland because, as the United States pointed out in its motion, Greenbelt is closer to Andrews Air Force Base and Bethesda Naval

Hospital, the medical records, and the majority of the Government health care providers. The United States has no opposition to plaintiffs' request.

4. I, the undersigned Assistant United States Attorney, do hereby certify that Counsel for plaintiffs, George J. Hanko III, Esquire, and I have reviewed and agreed to this joint agreement.

WHEREFORE, the parties respectfully request that the Court grant the United States' motion and transfer this case to the District of Maryland.

Respectfully submitted this 8<sup>th</sup> day of November, 2007.

LEURA G. CANARY  
United States Attorney

By: s/Stephen M. Doyle  
STEPHEN M. DOYLE  
Chief, Civil Division  
Assistant United States Attorney  
Post Office Box 197  
Montgomery, AL 36101-0197  
Telephone No.: (334) 223-7280  
Facsimile No.: (334) 223-7418  
E-mail: [stephen.doyle@usdoj.gov](mailto:stephen.doyle@usdoj.gov)

**Of Counsel:**

HILDEGARDE CONTE PERLSTEIN  
Chief, Medical Law Branch  
Claims and Tort Litigation Division  
HQ AFLOA/JACC  
1501 Wilson Blvd., Ste 835  
Arlington, VA 22209-2403  
Telephone No.: (703) 696-9022  
Facsimile No.: (703) 696-9009  
E-mail: [hilde.perlstein@pentagon.af.mil](mailto:hilde.perlstein@pentagon.af.mil)

s/George J. Hanko III  
George J. Hanko III  
SICO, WHITE & BRAUGH, L.L.P.  
Frost Bank Tower  
401 Congress Avenue, Suite 1540  
Austin, Texas 78701  
Telephone No.: (512) 473-0333  
Telefax: (512) 473-0333  
E-mail: [ghanko@swbtrial.com](mailto:ghanko@swbtrial.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2007, I Electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

George J. Hanko III, Esquire

s/Stephen M. Doyle  
Assistant United States Attorney